

1 JONATHAN DAVID FRANK  
160 Thorn Street Suite 2  
2 San Diego, CA 92103  
(858) 722-2100  
3 State Bar Number 89384  
4 Attorney for Material Witnesses  
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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
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|                              |   |                       |
|------------------------------|---|-----------------------|
| 11 UNITED STATES OF AMERICA, | ) | Case No. 08CR0212JLS  |
|                              | ) | Mag. No. 08MJ8417     |
| 12 Plaintiff,                | ) |                       |
|                              | ) |                       |
| 13 v.                        | ) | DECLARATION OF ISAIAS |
|                              | ) | GUERRERO-MALDONADO IN |
| 14 BENNY LOPEZ,              | ) | SUPPORT OF MOTION FOR |
| JUAN JOSE AGUIRRE-CRUZ       | ) | VIDEO DEPOSITION OF   |
|                              | ) | MATERIAL WITNESSES    |
|                              | ) |                       |
| 16 Defendants.               | ) | DATE: June 26, 2008   |
|                              |   | TIME: 2:30 P.m.       |
|                              |   | DEPT: PORTER          |

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17  
18  
19 I am a material witness in the above action. I have personal  
20 knowledge of the facts set forth in this action and could testify  
21 competently thereto if called.

22 I have been in federal custody since May 12, 2008. I have been  
23 held as a material witness in the above captioned case. I am unable  
24 to locate an acceptable surety to post the Court bond and therefore  
25 I remain in custody as I cannot secure my release on bond.

26 Each day I spend in custody is a hardship for me and my family.  
27 I help support my father. I have been doing so as a field worker in  
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1 Mexico for the past four years. Each day that I spend in custody is  
2 another day that I am unable to provide that support.

3 I declare under the penalty of perjury under the laws of the  
4 United States of America that the foregoing is true and correct of  
5 my own personal knowledge except as to those matters stated to be  
6 based upon information and belief and, as to those matters, I am  
7 informed and believe that they are true and correct. Executed this  
8 June 4, 2008 in El Centro, California.

9 Isaias GUERRERO MALDONADO

10 ISAIAS GUERRERO-MALDONADO

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12 *Translated by - Francis T. Young*  
13 *Interpreted - 6/4/08*  
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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA, )

12 Plaintiff, )

13 v. )

14 BENNY LOPEZ,  
JUAN JOSE AGUIRRE-CRUZ )

15 Defendants. )  
16

Case No. 08CR0212JLS  
Mag. No. 08MJ8417

DECLARATION OF MARCO  
HERNANDEZ-QUIROZ IN  
SUPPORT OF MOTION FOR  
VIDEO DEPOSITION OF  
MATERIAL WITNESSES

DATE: June 26, 2008  
TIME: 2:30 P.M.  
DEPT: PORTER

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22 held as a material witness in the above captioned case. I am unable  
23 to locate an acceptable surety to post the Court bond and therefore  
24 I remain in custody as I cannot secure my release on bond.

25 Each day I spend in custody is a hardship for me and my family.  
26 I help to support my grandmother. I have been doing so working in  
27 a tire shop for the past 8 years. Each day that I spend in custody  
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1 is another day that I am unable to provide that support.

2 I declare under the penalty of perjury under the laws of the  
3 United States of America that the foregoing is true and correct of  
4 my own personal knowledge except as to those matters stated to be  
5 based upon information and belief and, as to those matters, I am  
6 informed and believe that they are true and correct. Executed this  
7 June 4, 2008 in El Centro, California.

8 MARCO H

9 MARCO HERNANDEZ-QUIROZ

10 Translated by Francisco T. Genua  
11 Interpreter - 6/4/08  
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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
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|                              |   |                         |
|------------------------------|---|-------------------------|
| 11 UNITED STATES OF AMERICA, | ) | Case No. 08CR0212JLS    |
|                              | ) | Mag. No. 08MJ8417       |
| 12 Plaintiff,                | ) |                         |
|                              | ) |                         |
| 13 v.                        | ) | DECLARATION OF PEDRO    |
|                              | ) | GAMBOA-OCANA IN SUPPORT |
| 14 BENNY LOPEZ,              | ) | OF MOTION FOR VIDEO     |
| JUAN JOSE AGUIRRE-CRUZ       | ) | DEPOSITION OF MATERIAL  |
|                              | ) | WITNESSES               |
| 15                           | ) |                         |
| 16 Defendants.               | ) | DATE: JUNE 26, 2008     |
|                              |   | TIME: 2:30 P.M.         |
|                              |   | DEPT: PORTER            |

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24 to locate an acceptable surety to post the Court bond and therefore  
25 I remain in custody as I cannot secure my release on bond.

26 Each day I spend in custody is a hardship for me and my family.  
27 I essentially am the sole means of support of my wife and two  
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1 children ages 7 and 3. My wife does work outside of the home part  
2 time. I also help support my parents in Mexico. My mother has  
3 diabetes. I have  
4 been supporting my family working as a cook for the past 10 years.  
5 Each day that I spend in custody is another day that I am unable to  
6 provide that support.

7 I declare under the penalty of perjury under the laws of the  
8 United States of America that the foregoing is true and correct of  
9 my own personal knowledge except as to those matters stated to be  
10 based upon information and belief and, as to those matters, I am  
11 informed and believe that they are true and correct. Executed this  
12 June 4, 2008 in El Centro, California.

13 PEDRO S GAMBOA OCANA

14 PEDRO GAMBOA-OCANA

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16 Translated by: Frances T. Gomez  
17 Interpreter 6/4/08  
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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 BENNY LOPEZ,  
JUAN JOSE AGUIRRE-CRUZ  
15 Defendants.  
16

) Case No. 08CR0212JLS  
) Mag. No. 08MJ8417  
)

) DECLARATION OF ARTURO  
) ANDRADE-PEREZ IN SUPPORT  
) OF MOTION FOR VIDEO  
) DEPOSITION OF MATERIAL  
) WITNESSES  
)

DATE: JUNE 26, 2008  
TIME: 2:30 P.M.  
DEPT: PORTER

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23 held as a material witness in the above captioned case. I am unable  
24 to locate an acceptable surety to post the Court bond and therefore  
25 I remain in custody as I cannot secure my release on bond.

26 Each day I spend in custody is a hardship for me and my family.  
27 I am the sole support for my wife and two children, ages 15 and 7.  
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1 I also help to support my parents and sister. My father has  
2 hypertension and high blood pressure. I have been supporting my  
3 family as a laborer in Mexico for about 23 years. Each day that I  
4 spend in custody is another day that I am unable to provide that  
5 support.

6 I declare under the penalty of perjury under the laws of the  
7 United States of America that the foregoing is true and correct of  
8 my own personal knowledge except as to those matters stated to be  
9 based upon information and belief and, as to those matters, I am  
10 informed and believe that they are true and correct. Executed this  
11 June 4, 2008 in El Centro, California.

12 Arturo Andrade  
13 ARTURO ANDRADE-PEREZ  
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17 Translated by: Frances T. Young  
18 6/4/08  
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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
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11 UNITED STATES OF AMERICA, )

Case No. 08CR0212JLS  
Mag. No. 08MJ8417

12 Plaintiff, )

13 v. )

DECLARATION OF FRANCISCO  
SORIA-OROZCO IN SUPPORT  
OF MOTION FOR VIDEO  
DEPOSITION OF MATERIAL  
WITNESSES

14 BENNY LOPEZ,  
JUAN JOSE AGUIRRE-CRUZ )

15 Defendants. )  
16

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24 to locate an acceptable surety to post the Court bond and therefore  
25 I remain in custody as I cannot secure my release on bond.

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2 Each day I spend in custody is a hardship for me and my family.  
3 I am the sole means of support for my common law wife, who is  
4 pregnant and expecting in September. I also help to support my  
5 parents. I have been so supporting my family by working  
6 construction in Mexico for the past 10 years. Each day that I spend  
7 in custody is another day that I am unable to provide that support.

8 I declare under the penalty of perjury under the laws of the  
9 United States of America that the foregoing is true and correct of  
10 my own personal knowledge except as to those matters stated to be  
11 based upon information and belief and, as to those matters, I am  
12 informed and believe that they are true and correct. Executed this  
13 June 4, 2008 in El Centro, California.

14 Francisco Soria-Orozco

15 FRANCISCO SORIA-OROZCO

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17 Translated by Frances T. Henry  
18 Interpreter  
19 6/4/08  
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